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May 27, 2025

Hon. Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Keita, et al. (Jailyn Hilliard)
22-cr-435 (LAP)

Dear Judge Preska:

I am counsel for Jailyn Hilliard, one of the defendants in the above-captioned case pending before this Court. I write to request that the Court temporarily modify the condition of Ms. Hilliard's release to permit her to travel outside her district of residence to attend a cousin's graduation in Houston, Texas.

Ms. Hilliard seeks permission to travel by car Little Rock, Arkansas to Houston, Texas with members of her family. They would leave Friday, May 30, 2025, and return Sunday, June 1, 2025. They would stay with Ms. Hilliard's aunt at a location known to the government and Probation.

For the past 34 months while the case has been pending, Ms. Hilliard has been successfully supervised by Pretrial Services. She has demonstrated that she understands the seriousness of her situation and can be relied on to comply with the conditions of her release.

I have consulted with the Pretrial Services Officer who is supervising Ms. Hilliard and with the Assistant United States Attorney who is representing the government in this case. Neither objects to this request.

Travel approved
SO ORDERED
Loretta A. Preska 5/27/25
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE